# Hoag, Katherine

From: Hoag, Katherine

Sent: Thursday, March 14, 2013 4:49 PM

To: <a href="mailto:prainey@arb.ca.gov">prainey@arb.ca.gov</a>

Cc: Kurpius, Meredith; Flagg, MichaelA Subject: RE: Request for information.

## Hi Chris -

That sounds good. Yes I think we definitely said that the district's audits could count for one of the two semi-annual flow audits (I'm sure Michael or Meredith will chime in if I'm way off base). While their gaseous audits might not be independent enough etc to be counted as NPAP, they could potentially meet the annual PE requirement, so if you wanted to handle them differently, that may be possible.

Thanks for keeping us posted.

Kate

Katherine Hoag, Ph.D.
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Hoag.Katherine@epa.gov
(415) 972-3970

**From:** Rainey, Patrick@ARB [mailto:prainey@arb.ca.gov]

**Sent:** Tuesday, March 12, 2013 7:54 AM

**To:** Hoaq, Katherine

**Cc:** Kurpius, Meredith; Flagg, MichaelA **Subject:** RE: Request for information.

# Hello Kate,

Thank you for the response. This is the division of responsibilities I am planning to discuss with GBUAPCD and include in the R&R document. I know they have been performing their own audits using internal QA staff for many years, but in the past I don't believe these audits have been considered as part of the NPAP/PEP audits or entered into AQS as accuracy data for meeting the CFR requirement. I primarily wanted to confirm that their audit procedures had been found acceptable by EPA for meeting the semi-annual flow rate audit requirement, and that it would acceptable for GBUAPCD to perform re-audits of parameters found during ARB or GBUAPCD audits to be outside of criteria.

The NCore issue is one that we can continue to work with you on. I am not sure of the current status of the NCore site but will ask Chris about it when I talk to him next.

Thank you,

Patrick Rainey Air Pollution Specialist Quality Management Section Monitoring and Laboratory Division (916) 327-4756

# prainey@arb.ca.gov

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**From:** Hoag, Katherine [mailto:Hoag.Katherine@epa.gov]

**Sent:** Friday, March 08, 2013 4:28 PM

To: Rainey, Patrick@ARB

**Cc:** Kurpius, Meredith; Flagg, MichaelA **Subject:** RE: Request for information.

(fyi - Meredith and Michael)

Hi Patrick,

Is this what you CARB and GBUAPCD agreed on? I think the division of the responsibilities would be fine with us and meets the requirements, and I think any division of labor that meets the requirements and ensures quality data that CARB and GBUAPCD agree on would be fine with us.

For the NCore site, I think the same arrangement would be fine for O3 and the PM monitors, we'll have to keep working on the trace-level instruments at NCore (CO, SO2, NOy) in general – but that is a statewide issue. Is their NCore site operational now?

#### Kate

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From: Rainey, Patrick@ARB [mailto:prainey@arb.ca.gov]

**Sent:** Monday, March 04, 2013 12:58 PM

To: Hoaq, Katherine

**Subject:** RE: Request for information.

Hello Kate.

I am in the process of individualizing the PQAO Roles and Responsibilities document for Great Basin and wanted to confirm a couple of items regarding the ARB/Great Basin audit arrangement.

- ARB will continue to perform an annual audit of all gaseous, flow, and Met parameters that are reporting data for record.
- ARB and GBUAPCD will coordinate schedules so the semi-annual flow audits performed by ARB and GBUAPCD are performed 5-7 months apart, and the agency performing the audit is responsible for reporting audit results to AQS within 90 days following the end of the quarter.
- GBUAPCD will utilize a documentation mechanism (preferably the ARB CAN process) for documenting
  any issues or failures encountered during the audit. Documentation of any audit failures will be
  communicated to ARB.

• Either ARB or GBUAPCD may perform a re-audit of parameters that failed during the original audit. Responsibility for re-audits will be determined between ARB and GBUAPCD based on resource availability.

Will these arrangements also be acceptable for the GBUAPCD NCORE site?

Thank you for your help on this.

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From: <a href="mailto:Hoag.Katherine@epamail.epa.gov">Hoag.Katherine@epamail.epa.gov</a>]

Sent: Tuesday, November 20, 2012 12:31 PM

To: Rainey, Patrick@ARB

Cc: Flagq.MichaelA@epamail.epa.gov; Deidrick, Chris@ARB; Kurpius.Meredith@epamail.epa.gov

**Subject:** Re: Request for information.

Hi Patrick,

I do remember some issues with Great Basin flow audit scheduling during the windy season, but I don't remember how Merrin resolved it. I've cc'ed Chris since he was often included in those discussions as well. I think it is fine to split up the semiannual flow audits the way you describe so that CARB does one and Great Basin does one...it just adds a little bit of scheduling complication if plans change to still be able to meet the 5-7 month separation between audits guidance that needs to be met for proper AQS data and reports.

In terms of who (between CARB and a District) does what to fulfill this and other requirements, I think it's really up to you and the District to negotiate - and then I think the idea is to get it documented in the PQAO agreement letter.

Let me know if you need anything else-

## Kate

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From: Meredith Kurpius/R9/USEPA/US

To: Katherine Hoag/R9/USEPA/US@EPA, MichaelA Flagg/R9/USEPA/US@EPA,

Cc: "Rainey, Patrick@ARB" < prainey@arb.ca.gov>

Date: 11/19/2012 01:05 PM

Subject: Re: Request for information.

## Kate.

Can you help us with the thirds question below from Patrick? The status of flow audits for GBUAPCD is an ever-elusive issue for me and Michael.

## -Meredith

Meredith Kurpius, PhD Air Quality Analysis Office Air Division, US EPA 75 Hawthorne St., AIR-7 San Francisco,CA 94105 415-947-4534 (p) 415-947-3579 (f)

From: "Rainey, Patrick@ARB" < prainey@arb.ca.gov>

To: Meredith Kurpius/R9/USEPA/US@EPA,

Date: 11/16/2012 09:27 AM Subject: Request for information.

Hello Meredith,

Several questions have come up recently and I wanted to see if I could get some clarification from EPA.

- Is there a specific procedure we can direct monitoring organizations to for requesting a waiver from EPA for monitoring issues such as siting? We recently worked with Monterey Bay Unified APCD on a siting issue but could not give them clear guidance on the required process for requesting a waiver. The issue has been resolved and a waiver granted, but we are still not clear if there is a specific process to follow.
- There seems to be some difference of interpretation within EPA on the status of the PQAO designation for Great Basin Unified APCD. The TSA finding (DM8) indicates they are incorrectly listed as their own PQAO in AQS, but need to be changed to the ARB PQAO. However, in discussions that we had with Fletcher with regard to metadata updates he indicated that they act as their own PQAO and will work directly with EPA to make their metadata corrections. We are in the process of preparing a letter to address DM8 and would like to get some clarification before proceeding.
- Also, can EPA verify that ARB is only responsible for conducting and entering one of the two required semiannual PM flow audits for samplers within the GBUAPCD? The understanding that Merrin had was that GBUAPCD would conduct the second flow checks because they wanted to retain the flexibility of schedule by doing it themselves because the second audit typically occurs during the high wind/dust season and they did not want the samplers off-line during wind events. We are not seeing any audits conducted by GBUAPCD in AQS and wanted to verify.

Please contact me if you have any questions.

Thank you,

Patrick Rainey
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